

Carrier-to-Carrier Guidelines Metric Changes Proposal

1. The Virginia telecommunications industry should take advantage of the work of the existing New York Carrier Working Group (“NY Carrier Working Group”) to update the Verizon Virginia Inc. (“Verizon VA”) Carrier-To-Carrier Guidelines metrics definitions and performance standards and modifying such standards to meet local Virginia conditions as necessary. The NY Carrier Working Group has been in operation for nearly 4 years and includes active participation by a number of competitive local exchange carriers (“CLECs”), including many that have affiliates that do business in Virginia. The NY Carrier Working Group holds regular meetings and conference calls and is open to all CLECs. In addition, information regarding the NY Carrier Working Group and its meetings is publicly available to CLECs that are not participants, as well as, other interested parties. The Virginia State Corporation Commission (“Commission”) should strongly consider adopting any metric definitions and performance standards and subsequent change(s) developed through the NY Carrier Working Group.
2. The Commission should initially adopt a set of Verizon VA Carrier-To-Carrier Guidelines based on the existing NY Carrier-to-Carrier Guidelines allowing for state specific modifications such as different holiday schedules, differences in Operation Support Systems (“OSS”), and geographical differences. In addition, the Commission should adopt in this initial Verizon VA Carrier-To-Carrier Guidelines, any additional performance standards or metrics definitions agreed on as part of the Virginia Collaborative Committee (“VA Collaborative”). The Commission Staff will submit to the Commission the Verizon VA Carrier-To-Carrier Guidelines developed through the subcommittee on Performance Standards/Remedy Plans (“Standards Subcommittee”) of the VA Collaborative (including agreed to changes and/or additions). In addition, the Commission Staff in conjunction the Standards Subcommittee shall identify and submit to the Commission the remaining known or agreed upon open or unresolved issues. In its evaluation of the Verizon VA Carrier-To-Carrier Guidelines the Commission should provide an opportunity for any party to comment and/or request a hearing on the guidelines. In particular, the Commission should seek specific comments on the unresolved issues identified from the Standards Subcommittee.
3. On a going forward basis, proposed changes to the Verizon VA Carrier-To-Carrier Guidelines shall be considered for adoption by the Commission under the following procedures:

- **Consensus Decisions¹ and Nonconsensus Decisions²**

¹ A consensus decision is a change to the NY Carrier-To-Carrier Guidelines that has been agreed to (or not opposed) by the parties in the NY Carrier Working Group and has been approved by the New York Public Service Commission.

² A nonconsensus decision is a change to the NY Carrier-To-Carrier Guidelines that has been approved by the New York Public Service Commission but not agreed to by all parties in the NY Carrier Working Group.

- Verizon VA shall file with the Commission the New York consensus and/or nonconsensus metric change(s) and proposed implementation interval(s), including an explanation of time required to implement and description of the changes made to adapt to Virginia systems. Such filings shall be within 30 calendar days of the submission date of the compliance filing in New York³.
- With each such filing, Verizon VA may submit to the Commission any opposition to adoption of any metric change(s). Verizon VA shall set forth its reasons for opposition in any such filing.
- Verizon VA shall make an electronic copy of its filing on the proposed consensus and/or nonconsensus change(s) available to the Standards Subcommittee and the Commission Staff at time of filing. The Division of Communications shall make an electronic version available on its website page within 48 hours of filing (excluding weekends and holidays).
- The Commission Staff, Office of Attorney General and interested parties shall have an opportunity to comment and/or request a hearing on the proposed metric change(s) submitted by Verizon VA. Such comments are not limited to but should address whether the metric change(s) appropriately adapts the New York metric to Virginia and on the proposed implementation interval(s). Verizon VA and others that did not object to a metric change(s) or proposed implementation interval(s) shall be provided an opportunity to respond if anyone objects to the adoption of the change(s) or implementation intervals.
- If neither the Commission Staff, the Office of Attorney General, or any interested party, including Verizon VA, has objected to the adoption of a proposed consensus or nonconsensus metric change(s) after the Commission has provided an opportunity for comment, the change should be considered approved forty-five (45) days after submission of filing, unless otherwise ordered by the Commission.
- **Other**
 - The VA Collaborative and Standards Subcommittee shall remain as a forum for parties to discuss performance standards and metric change(s) issues.
 - No one shall be prevented from proposing metric change(s) to the Verizon VA Carrier-To-Carrier Guidelines in accordance with the Commission's Rules of Practice and Procedure. However, the Commission should encourage parties to continue participating in the VA Collaborative process and to consider the Standards Subcommittee as the most appropriate vehicle for the initial consideration of any proposed Virginia-specific metric change(s).
 - The VA Collaborative and/or Standards Subcommittee may submit Virginia specific proposed metric change(s) to the Verizon VA Carrier-To-Carrier Guidelines to the Commission for its consideration. These proposals may be either on a consensus or nonconsensus basis; provided that any party shall be free to oppose before the Commission a proposal to which it has not agreed.

³ The compliance filing in New York is the filing by Verizon New York with the New York Public Service Commission of revisions to the NY Carrier-To-Carrier Guidelines that contain metric changes that have been approved by the New York Public Service Commission.